



STATE BAR NO: 107814

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Attorney for Plaintiff Elsa Shekelle, as Trustee of the Martha J. Voester Living Trust,
Established June 30, 2002

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

<p>In Re:</p> <p>ROBERT PETERSON,</p> <p>KATHRYN PETERSON,</p> <p>Debtors.</p> <hr/> <p>ELSA SHEKELLE, as Trustee of the Martha J. Voester Living Trust, Established June 30, 2002,</p> <p>Plaintiff,</p> <p>vs.</p> <p>ROBERT PETERSON and KATHRYN PETERSON,</p> <p>Defendants.</p> <hr/>	<p>) Case No. 2018-22123</p> <p>) Chapter 13</p> <p>)</p> <p>) DC No. DEF-010</p> <p>)</p> <p>) <u>CREDITOR ELSA SHEKELLE,</u></p> <p>) <u>TRUSTEE'S LIMITED</u></p> <p>) <u>OPPOSITION TO DEBTORS' EX</u></p> <p>) <u>PARTE APPLICATION TO</u></p> <p>) <u>EMPLOY REAL ESTATE AGENT</u></p> <p>) <u>AND BROKER AND FOR</u></p> <p>) <u>COMPENSATION TO REAL</u></p> <p>) <u>ESTATE AGENT AND BROKER</u></p> <p>)</p> <p>) Date: None Scheduled</p> <p>) Time: None Scheduled</p> <p>) Judge Hon. Ronald H. Sargis;</p> <p>) Chief Bankruptcy Judge</p>
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Creditor Elsa Shekelle, as Trustee of the Martha J. Voester Living Trust,
Established June 30, 2002, by and through her attorney of record, Stephen T. Cammack,
Esq./Stephen T. Cammack Law Offices, hereby submits her Limited Opposition to the
Debtors' Ex Parte Application To Employ Real Estate Agent And Broker And For
Compensation To Real Estate Agent And Broker as follows:

1 Debtors' **Exhibit C** to this Ex Parte Application attaches a Sellers' Estimated Payoff
2 Statement through First American Title Company. Page 1 of this Statement under
3 "**Miscellaneous,**" Sub-item "**payment per invoice to Elsa Shekelle,**" there is a referenced
4 payment in the amount of \$114,341.00. This is the amount of the original Judgment for
5 Nondischargeability of Debt issued by the Court on March 31, 2022, in the amount of
6 \$123,486.51 (comprised of \$114,341.70 original principal and prejudgment interest of
7 \$9,144.81).
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9 In addition, the Court-issued Judgment for Nondischargeable Debt on behalf of
10 Creditor Elsa Shekelle and against the Debtors specifically calls for per annum interest in the
11 amount of post judgment simple interest at 10% per annum.
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13 Therefore, Creditor Elsa Shekelle does not want the Court's routine Order granting
14 Debtors' Application to employ and pay real estate commissions, to be misconstrued as some
15 form of de facto order now reducing the amount of the Nondischargeable Judgment payoff in
16 this case.


17 Creditor Elsa Shekelle respectfully requests this Court to condition any Order granting
18 the Debtors' Ex Parte Application on the Debtors' escrow company submitting a payoff
19 demand to Creditor Elsa Shekelle's legal counsel, **Stephen T. Cammack, Esq./Stephen T.**
20 **Cammack Law Offices**, in exchange for the submission of a Full Satisfaction Of Judgment
21 of the underlying Nondischargeable Judgment against the debtors. This calculated payoff
22 demand will account for all post-judgment interest and Plan payments received by the
23 Chapter 13 Trustee.
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Dated: November 18, 2022

Respectfully Submitted,
STEPHEN T. CAMMACK
LAW OFFICES

By 
Stephen T. Cammack, Esq., Counsel
for Creditor **Elsa Shekelle, as Trustee of the
Martha J. Voester Living Trust, Established
June 30, 2002**